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Counsel to the Debtors and Debtors in Possession

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11

Gawker Media LLC, et al., Case No. 16-11700 (SMB)

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Debtors. : (Jointly Administered)

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CERTIFICATE OF NO OBJECTION TO DEBTORS' APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF BUSH ROSS, P.A. AS SPECIAL FLORIDA LITIGATION CONFLICTS COUNSEL FOR THE DEBTORS AND DEBTORS IN POSSESSION EFFECTIVE NUNC PRO TUNC TO OCTOBER 29, 2016

1. On November 18, 2016, the Debtors filed and served the *Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Bush Ross, P.A. as Special Florida Litigation Conflicts Counsel for the Debtors and Debtors in Possession Effective Nunc Pro Tunc to October 29, 2016* (the "Application") [Docket No. 464], and attached as Exhibit A thereto, a proposed order granting the Application (the "Proposed Order").

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (5056). Gawker Media LLC and Gawker Media Group, Inc.'s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.'s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

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- 2. On November 18, 2016, the Debtors filed the *Notice of Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Bush Ross, P.A. as Special Florida Litigation Conflicts Counsel for the Debtors and Debtors in Possession Effective Nunc Pro Tunc to October 29, 2016* (the "Notice") [Docket No. 464].
- 3. On November 18, 2016, the Debtors served the Notice, Application and Proposed Order as set forth in the *Affidavit of Service* [Docket No. 482].
- 4. Pursuant to the Notice, responses to the Application were due no later than December 1, 2016 at 4:00 p.m. (prevailing Eastern Time) (the "Objection Deadline").
- 5. The undersigned further certifies that the Debtors have not received any answer, objection or other responsive pleading with respect to the Application and that no such answer, objection or other responsive pleading has appeared on the Bankruptcy Court's docket in the Debtors' chapter 11 cases.

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6. There having been no answer, objection, or other responsive pleadings filed by the Objection Deadline, the Debtors will submit to the Court for entry a proposed order approving the Application substantially in the form that was attached to the Application without a hearing.

Dated: December 6, 2016 New York, New York

/s/ Gregg M. Galardi

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